

BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In The Matter Of:)
)
THE ANNUAL COST RECOVERY FILING)
FOR DEMAND SIDE MANAGEMENT BY)
THE UNION LIGHT, HEAT AND POWER COMPANY)

CASE NO. 2004-00389

* * * * *

MOTION TO INTERVENE

Comes now the Commonwealth of Kentucky, Environmental and Public Protection Cabinet, Division of Energy (KDOE), and pursuant to 807 KAR 5:001, Section 3, requests leave to intervene in the above-styled case, and that it be granted full intervention status.

The KDOE has a statutory mandate to “develop and implement programs for the development, conservation, and utilization of energy in a manner to meet human needs while maintaining Kentucky’s economy at the highest feasible level.” (KRS Chapter 224.10-100(28-29)). KDOE serves as the state energy office for Kentucky and administers a range of programs designed to enhance the efficiency of energy production and use in all sectors of the economy.

KDOE has a special interest in this proceeding which is not otherwise adequately represented. KDOE will present issues or develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

WHEREFORE, KDOE respectfully requests that is motion for full intervention be granted.

Respectfully submitted,



IRIS SKIDMORE
Office of Legal Services
Fifth Floor, Capital Plaza Tower
Frankfort, Kentucky 406002
Phone: (502) 564-2356 ext. 750; Fax: (502) 564-9212

COUNSEL FOR KENTUCKY DIVISION
OF ENERGY

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of October, 2004, a true and accurate copy of the foregoing **MOTION** was mailed, postage pre-paid, to the following:

Hon. John J. Finnigan, Jr.
Senior Counsel
The Union Light Heat & Power Company
139 E. Fourth Street
Cincinnati, Ohio 45202

Hon. Michael J. Pahutski
Attorney at Law
The Union Light Heat & Power Company
139 E. Fourth Street
Cincinnati, Ohio 45202

Ann Louise Chevront, Assistant Attorney General
The Kentucky Office of the Attorney General
1024 Capital Center Drive
Frankfort, Kentucky 40602-2000

Richard G. Raff
Public Service Commission
730 Schenkel Lane
Frankfort, Kentucky 40602

Brian Angus
Northern Kentucky Community Action Commission
P.O. Box 193
Covington, Kentucky 41012

Carl Melcher
Northern Kentucky Legal Aid, Inc.
302 Greenup
Covington, Kentucky 41011



Iris Skidmore